

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

Madison Hotel Owners, LLC,

Case No. 11-12334

Debtor.

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In re

Chapter 11

Madison Hotel, LLC,

Case No. 11-12560

Debtor.

RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY

Madison Hotel Owners, LLC and Madison Hotel, LLC (“Debtors”), as and for their response to the motion made by 62 Madison Lender, LLC and Nomad Mezz Lending, LLC to terminate exclusivity, respectfully represent as follows: to the extent that the Court approves the Debtors’ Disclosure Statement, the Debtors oppose the Motion so that the Debtors can complete their plan process as contemplated by section 1121 of the Code.

Dated: New York, New York
September 22, 2011

BACKENROTH FRANKEL & KRINSKY, LLP

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